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15 Attorneys for Defendant

16 SCHENKER, INC.

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA - SAN JOSE DIVISION

19
20 ERIC M. WICKHAM, on behalf of himself,
all others similarly situated,

21 *Plaintiff,*

22 vs.

23 SCHENKER, INC., a New York company;
24 and DOES 1 through 50, inclusive,

25 *Defendants.*

Case No. 5:23-cv-00946-PCP

Assigned For All Purposes to the
Hon. P. Casey Pitts, Courtroom 8

**JOINT STIPULATION AND [PROPOSED]
ORDER TO CONTINUE HEARING ON
MOTION FOR PRELIMINARY APPROVAL
OF SETTLEMENT**

Complaint Filed: November 20, 2019
FAC Filed: August 18, 2021
SAC Filed: March 2, 2023

Plaintiff ERIC M. WICKHAM (“Plaintiff”) and SCHENKER, INC. (“Defendant”) (collectively referred as “the Parties”), through their respective counsel, hereby stipulate that the hearing and associated filing deadlines for Plaintiff’s Motion for Preliminary Approval of Settlement be continued for approximately three (3) weeks. The Parties are diligently in the process of finalized the documents to be filed in conjunction with the Motion for Preliminary Approval of Settlement and anticipate some delays, particularly in obtaining internal approval and signatures during the holidays. The Parties jointly request that the hearing on Motion for Preliminary Approval of Settlement, currently set for February 13, 2025 be continued to March 6, 2025 or to a date convenient for the Court. The Parties also request that the deadline for filing of the Motion for Preliminary Approval of Settlement be continued from January 8, 2025 to January 29, 2025 or to a date to correspond with the new hearing date.

Respectfully submitted,

DATED: December 20, 2024

SETAREH LAW GROUP

/s/ Brian Louis

SHAUN SETAREH
BRIAN LOUIS
Attorneys for Plaintiff
ERIC M. WICKHAM

DATED: December 20, 2024

LITTLER MENDELSON, P.C.

/s/ Jamie Lee

CURTIS A. GRAHAM
JAMIE Y. LEE
Attorneys for Defendant
SCHENKER, INC.

[PROPOSED] ORDER

PURSUANT TO THE ABOVE STIPULATION, AND GOOD CAUSE APPEARING
THEREFORE, IT IS SO ORDERED.

Having considered the parties' stipulation, and good cause appearing therefore, the Court
orders that the hearing on Plaintiff's Motion for Preliminary Approval of Settlement is hereby
continued from February 13, 2025 to _____. The deadline to file the Motion for
Preliminary Approval of Settlement is continued from January 8, 2025 to _____.

IT IS SO ORDERED.

DATED: _____, 2024

Hon. P. Casey Pitts
United States District Court Judge

4938-6559-9753.1 / 070732-1052

PROOF OF SERVICE BY ELECTRONIC TRANSMISSION

I am employed in Fresno County, California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is 5200 North Palm Avenue, Suite 302, Fresno, California 93704.2225. On this 20th day of December, 2024, I served a copy of the within document(s):

**JOINT STIPULATION AND [PROPOSED] ORDER TO
CONTINUE HEARING ON MOTION FOR PRELIMINARY
APPROVAL OF SETTLEMENT**

Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the e-mail addresses on the attached service list on the dates and at the times stated thereon. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. The electronic notification address of the person making the service is jdrudge@littler.com:

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ATTORNEY FOR PLAINTIFF
ERIC M. WICKHAM

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on this 20th day of December, 2024, at Fresno, California.

Jennifer A. Drudge

Jennifer A. Drudge